

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW JERSEY  
CAMDEN VICINAGE**

**IN RE: VALSARTAN, LOSARTAN,  
AND IRBESARTAN PRODUCTS  
LIABILITY LITIGATION**

**This Document Relates to All Actions**

MDL No. 2875

Honorable Robert B. Kugler,  
District Court Judge

Honorable Karen M.  
Williams,  
Magistrate Judge

**NOTICE OF THE ZHP PARTIES' MOTION FOR PROTECTIVE ORDER  
PRECLUDING THE DEPOSITION OF ZHP PRESIDENT BAOHUA CHEN**

To: Adam M. Slater, Esquire  
Mazie Slater Katz & Freeman  
103 Eisenhower Parkway  
Suite 207  
Roseland, NJ 07068

**PLEASE TAKE NOTICE** that on May 17, 2021, the ZHP Parties, by and through their undersigned counsel, shall move before the Honorable Robert B. Kugler, the Honorable Karen M. Williams, and the Honorable Special Master Thomas I. Vanaskie, for an ORDER precluding the deposition ZHP President Baohua Chen.

**PLEASE TAKE FURTHER NOTICE** that in support of this motion, the ZHP Parties shall rely on the accompanying Brief in Support of their Motion for a Protective Order Precluding the Deposition of ZHP President Baohua Chen.

**PLEASE TAKE FURTHER NOTICE** that, for the Court's convenience, a proposed form of Order pursuant to Local Civil Rule 5.3(c)(6), is also submitted herewith.

**PLEASE TAKE FURTHER NOTICE** that the undersigned attorneys for the ZHP Parties request oral argument on this motion.

**PLEASE TAKE FURTHER NOTICE** that a Certificate of Service attesting to the date and manner of service is submitted herewith.

May 17, 2021

Respectfully submitted,

By: /s/ Seth A. Goldberg

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